

**FILED**UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO**AUG 13 2024**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**MITCHELL R. ELFERS**  
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**ASHKIA RANDY LEE TRUJILLO,**

Defendant.

CRIMINAL NO. 24-1117 DHUCounts 1 and 2: 18 U.S.C. §§ 1153,  
2241(a) and 2246(2)(A) Aggravated  
Sexual Abuse;Count 3: 18 U.S.C. §§ 1153, 2241(a) and  
2246(2)(B) Aggravated Sexual Abuse.INDICTMENT

The Grand Jury charges:

Count 1

On or about August 28, 2019, in Indian Country, in Rio Arriba County, in the District of New Mexico, the defendant, **ASHKIA RANDY LEE TRUJILLO**, an Indian, unlawfully and knowingly engaged in and attempted to engage in a sexual act with Jane Doe, by using force and by threatening and placing Jane Doe in fear that any person would be subjected to death, serious bodily injury, and kidnapping, and the sexual act consisted of contact between the penis of the defendant and the vulva of Jane Doe, involving penetration, however slight.

In violation of 18 U.S.C. §§ 1153, 2241(a), and 2246(2)(A).

Count 2

On or about August 28, 2019, in Indian Country, in Rio Arriba County, in the District of New Mexico, the defendant, **ASHKIA RANDY LEE TRUJILLO**, an Indian, unlawfully and knowingly engaged in and attempted to engage in a sexual act with Jane Doe, by using force and by threatening and placing Jane Doe in fear that any person would be subjected to death, serious

bodily injury, and kidnapping, and the sexual act consisted of contact between the penis of the defendant and the anus of Jane Doe, involving penetration, however slight.

In violation of 18 U.S.C. §§ 1153, 2241(a), and 2246(2)(A).

Count 3

On or about August 28, 2019, in Indian Country, in Rio Arriba County, in the District of New Mexico, the defendant, **ASHKIA RANDY LEE TRUJILLO**, an Indian, unlawfully and knowingly engaged in and attempted to engage in a sexual act with Jane Doe, by using force and by threatening and placing Jane Doe in fear that any person would be subjected to death, serious bodily injury, and kidnapping, and the sexual act consisted of contact between the penis of the defendant and the mouth of Jane Doe, involving penetration, however slight.

In violation of 18 U.S.C. §§ 1153, 2241(a), and 2246(2)(B).

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

  
Assistant United States Attorney  
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